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10 **UNITED STATES BANKRUPTCY COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**
 12 **SACRAMENTO DIVISION**

13 In re:)	Case No.	21-20600-C-11
)	DCN:	RLC-7
14 Victoria Gewalt,)		
)	No hearing required.	
15 Debtor.)		
)	Judge Christopher M. Klein	

16 **EX PARTE APPLICATION TO APPROVE EMPLOYMENT OF**
 17 **SPECIAL COUNSEL LESLI BOLNER**
 18 **[11 U.S.C. § 327]**

19 Victoria Gewalt, the Chapter 11 Debtor and Debtor in Possession in the above-
 20 captioned matter (hereinafter "Debtor"), hereby requests authority to employ Lesli Bolner as
 21 special counsel in this case and represents as follows:

- 22 1. The present case was filed on February 22, 2021 as a voluntary Chapter 11
 23 case.
- 24 2. Debtor wishes to employ Lesli Bolner of Seale & Ross, PLC. She is an
 25 attorney admitted to the Louisiana Bar since 1992. Debtor selected Ms. Bolner because she is
 26 experienced in Louisiana real estate law, and she and the firm are well-qualified to represent
 27 the Debtor.
- 28 3. The Debtor anticipates that the following professional services will be
 required:
 - a. Consultation with Debtor regarding ownership interest and potential sale of
 Debtor's properties in Louisiana.

1 4. Lesli Bolner and Seale & Ross, PLC do not have any connections with the
2 Debtor, its creditors, any other party in interest, their respective attorneys or accountants, the
3 U.S. Trustee, or any person employed in the Office of the U.S. Trustee.

4 5. None of the conditions discussed in the Bolner Declaration would preclude
5 employment. Lesli Bolner and Seale & Ross, PLC do not hold or represent any interest
6 adverse to the estate.

7 6. Lesli Bolner and Seale & Ross, PLC have not agreed to share with any person
8 or entity any compensation they may be awarded in this case, except among those in their
9 employ. No other payments have been made or promised to Lesli Bolner or Seale & Ross,
10 PLC in connection with this employment other than prior to the filing of the bankruptcy.

11 7. The services to be provided by Lesli Bolner and Seale & Ross, PLC are in the
12 best interest of the case. The Debtor believes it is essential that the attorney Lesli Bolner be
13 employed to represent it in the present case.

14 **WHEREFORE**, the Debtor respectfully requests that it be authorized and empowered to
15 employ Lesli Bolner and Seale & Ross, PLC as an attorney in aid of these proceedings from
16 May 29, 2021 forward, and for such other and further relief as the Court may deem proper
17 under the circumstances.

18 Dated: June 29, 2021

REYNOLDS LAW CORPORATION

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21 /s/ Stephen M. Reynolds

Stephen M. Reynolds

Attorney for Debtor Victoria Gewalt